

# Wellington Civic Trust

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13<sup>th</sup> February 2023

**The Hearing Commissioners**

**Proposed Wellington City District Plan**

Dear Commissioners,

## ***Proposed District Plan: Hearing Stream One***

Wellington Civic Trust (Submitter No 388) has made a number of submissions on the Proposed District Plan. Unfortunately we are unable to attend the Hearing Stream One hearings. We have not asked to be heard, and are not presenting evidence.

We have reviewed the Section 42 Analysis Report prepared by Council Officers and would request that you consider the comments set out below.

Part of Report	Comment
14.3 CC – Tāone Kāwana - Capital City chapter (P1 Sch1)  Recommendations para 843-845	We support the retention of CC-01 and CC-03 in accordance with our submission.  We also support the clarification to CC-02 as recommended in the report arising from the suggestions of others. The wording changes proposed provide clarity.

<p>14.6 NE - Natural Environment chapter (P1 Sch1)</p> <p>Recommendations para 959</p>	<p>While we recognise that the report has made a favourable recommendation on this submission, we consider that our suggested rewording of the chapeau of this strategic objective is more comprehensive and links better to items 1-4 (incorrectly numbered in the report) that follow. The objective should be primarily about expanding the city’s component of open space. “Retaining and expanding” are not alternatives that can be combined as suggested in this objective, in our view. Our suggested rewording is aimed at the overall intention of expansion, with the outcome being the provision and retention of an extensive open space network at any future point in time as the city’s population grows.</p> <p>We ask that the hearing panel gives careful attention to our suggested rewording.</p>
<p>14.8 SRCC - Sustainability, Resilience and Climate Change chapter (ISPP and P1 Sch1)</p> <p>Recommendation para 1104 and 1105</p>	<p>The Civic Trust is concerned about the looseness of the strategic provisions relating to resilience and climate change. In particular in our submission we pointed out that O2 does not give effect to the NZCPS Policy 25 – mandatory national direction which requires avoiding increasing the risk of social, environmental and economic harm from coastal hazards. In paragraph 1057, the report suggest that this applies only to areas of new development – that is clearly a misunderstanding of the requirements of Policy 25 (a) which applies everywhere in the coastal environment. The suggestion in paragraph 1083 that O3 adequately deals with the matter of avoiding increasing risk is clearly incorrect – that objective simply refers to “effectively managing the risks associated with sea level rise and climate change”. It does not mention or require avoidance of risk and there is no indication of what “effectively managing risks” might mean. The best way to deal with the NZCPS requirement, and good planning practice, would be to add a further item to the list of items on O2 – e.g. “4. Avoided when they involve risk of coastal hazards, including those involving sea level rise and climate change”. The suggestion to modify the second clause (not attributed to the Civic Trust’s submission) lacks both context and precision.</p> <p>We note that the report refers to the Civic Trust’s submission to underpin a change of wording to the third clause in O3. While we do not oppose the suggested rewording, it actually has nothing to do with the submission which is concerned about climate change and sea level rise. Sea level rise is a slow, insidious and increasing hazard threat – to delay a response to it until “there is a high risk to life or buildings” suggests a worrying attitude towards the requirements of the NZCPS and the growing risks associated with sea level rise.</p>

Thank you for the opportunity to provide these comments.

Sylvia Allan, for Secretary

**Wellington Civic Trust**